

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CONOPCO, INC. d/b/a UNILEVER,

*Plaintiff,*

v.

2026 THIRD REALTY, LLC, HAE HEE  
KIM, COURTNEY HAEJIN KIM, DANIEL  
KIM, BRYANT KIM, K & K FOOTWEAR,  
INC., AND JOHN DOES 1-10, inclusive,

*Defendants.*

Case No. 22-cv-03480 (AT)

**INVENTORY OF MATERIALS AND RECORDS  
SEIZED BY UNILEVER ON MAY 3, 2022**

**FILED UNDER SEAL**

In accordance with the *Ex Parte* Temporary Restraining Order, Order Authorizing *Ex Parte* Seizure, Order to Show Cause for Preliminary Injunction, and Order Allowing Expedited Discovery issued by the Court on April 29, 2022 (the “TRO”), Plaintiff Conopco, Inc. d/b/a/ Unilever (“Unilever”) hereby provides an inventory of materials and records seized on May 3, 2022 in accordance with the seizure order included in the TRO at the following two locations: (1) 2026 3<sup>rd</sup> Avenue, New York, New York 10029 (“2026 3<sup>rd</sup> Avenue”), and (2) 152 Delaware Ave, Haworth, New Jersey (“Haworth, NJ”).<sup>1</sup>

**I. Materials and Records Seized from 2026 3<sup>rd</sup> Avenue:**

Unilever’s investigators seized the following items from 2026 3<sup>rd</sup> Avenue on May 3, 2022:

1. Box of twenty-four (24) 8oz bottles of “PEDIASURE GROW & GAIN BANANA SHAKE” – Expiration: FEB 1, 2021
2. Box of twenty-four (24) 8oz cans of “PEDIASURE GROW & GAIN VANILLA DRINK” – Expiration: SEP 1, 2020

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<sup>1</sup> Unilever, with the assistance of its investigators, Polaris Corporate Risk Management LLC (“Polaris”), and the New York Police Department (“NYPD”), also executed the seizure order included in the TRO at 1992 3<sup>rd</sup> Avenue, New York, New York 10029 (“1992 3<sup>rd</sup> Avenue”) on May 3, 2022. Unilever did not seize any materials or records at 1992 3<sup>rd</sup> Avenue.

3. Box of twenty-four (24) 8oz cartons of “ENSURE CLEAR APPLE NUTRITION DRINK” – Expiration: DEC 1, 2020
4. Large garbage bag full of expired Hellmann’s mayonnaise labels
5. Bag full of a variety of documents and mail including business invoices and bank statements
6. Box containing a variety of documents, an ink micro message dater, an opened jar of Hellman’s mayonnaise with a partially ripped label, and a sack of Hellmann’s light mayonnaise labels with a best if used by date of April 3, 2023
7. Large box containing 2x empty Hellmann’s mayonnaise cardboard trays, 3x boxes with shipping to Mustafa Ganchi of Vibrant Printing and Graphic (4015 White Plains Rd), and plastic container full of a variety of documents, receipts, and invoices
8. Accordion folder containing a variety of documents
9. 2x vetch home telephones

**II. Materials and Records Seized from Haworth, NJ:**

Unilever’s investigators seized the following devices/electronic items from Haworth, NJ on May 3, 2022:

1. Three (3) Laptops
  - a. Dell Laptop, Inspiron; Model: PP23LA
  - b. Lenovo Laptop; Model: 20220; Serial No.: CB22640128
  - c. Compaq Presario Laptop; Series: CM2060; Model: 1456VQL1Q-2
2. Three (3) Desktop Monitors/Computers
  - a. iMac Desktop Computer (with charger); Model: A2438; EMC: 3663; Serial: H4TFQ1KDQ1KDQ6W5
  - b. Dell Desktop Monitor (Small); Model: 1708FPt; Serial: 07070L0600381
  - c. Dell Desktop Monitor (large); XPS one 2710; 0XPCQ3
3. Five (5) PC Box Hard Drives:
  - a. Dell PC Box; 0XPCQ3
  - b. Mac PC Box; Model: A1047; EMC: 1969
  - c. Dell PC Box; Serial No.: 3W72W11; Model No.: DHM
  - d. Dell Inspiron PC Box 2200
  - e. Dell Inspiron PC Box; Model: 0XPCQ3 (same as earlier Dell PC box)
4. Two (2) iPads:
  - a. iPad 1 (pink case); Passcode: 120962

- b. iPad 2 (black case); Passcode: 1343
5. Five (5) Phones:
- a. Samsung Galaxy S9, no passcode
  - b. Samsung Galaxy Note10+, passcode is 1209
  - c. iPhone X, no passcode
  - d. Samsung Galaxy S5 – appears to be an older phone, likely no passcode
  - e. iPhone (type unknown), Passcode: 0000, Model: Unknown

Unilever's investigators also seized the following additional non-electronic items from Haworth, NJ on May 3, 2022:

- 1. Evidence Bag 1:
  - a. Notebook 1
  - b. Notebook 2
  - c. Manilla Envelope
- 2. Evidence Bag 2:
  - a. Blue Ledger
- 3. Evidence Bag 3:
  - a. Postal Meter

As of May 5, 2022, the five phones seized from Haworth, NJ were returned to Defendant Daniel Kim. Pursuant to the TRO, Unilever's representatives are promptly inspecting the items seized, and if any items are found to be outside the scope of the TRO, such items will be returned to Defendants by no later than May 10, 2022 (seven days after the May 3, 2022 seizure).

Dated: May 6, 2022

Respectfully submitted,

/s/ Mary Kate Brennan

Mary Kate Brennan

Anna Naydonov (*pro hac vice* to be filed)

Spencer K. Beall (*pro hac vice* to be filed)

Rosie Norwood-Kelly (*pro hac vice* to be filed)

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